



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

December 18, 2000

Mr. Bryan L. Foley  
U.S. Department of Energy  
3350 George Washington Way  
Room: 2D48 - MSIN: H0-12  
Richland, Washington 99352

**RECEIVED**  
DEC 28 2000  
**EDMC**

Dear Mr. Foley:

Re: 200-CW-1 Gable Mountain/B Ponds and Ditches Cooling Water Group Operable  
Unit Remedial Investigation Report

The Washington State Department of Ecology (Ecology) has completed its evaluation, in consultation with Mr. Jay McConnaughey, Washington State Department of Fish and Wildlife, of the report, *200-CW-1 Operable Unit Remedial Investigation Report, DOE/RL-2000-35, Draft A*, submitted by the U.S. Department of Energy (USDOE). 53863

The overall objectives of the Remedial Investigation (RI) Report are to:

- Evaluate the data generated during the RI and other characterization activities,
- Determine the need to proceed with a feasibility study (FS), and
- Determine which constituents and site-specific considerations need to be addressed in the FS.

This report: (1) adequately evaluates the data, and (2) is sufficient to make a decision to proceed with the FS. It fulfills the first two objectives listed above.

Ecology recognizes that the sites in the 200-CW-1 Operable Unit (OU) include sites in areas designated for different land uses. In general, the RI Report is adequate for areas designated *Industrial Exclusive*, and is inadequate in areas designated for *Preservation (Mining)*:

- For sites in the latter category (e.g., for the large ponds and for the ditches "outside the fence") the RI Report does not adequately determine which constituents and site-specific considerations need to be addressed in the FS.
- For sites in the former category (e.g., for the ditches "inside the fence") the remedial investigation is adequate to determine which constituents and site-specific considerations need to be addressed in the FS.

Therefore, Ecology endorses (approves) your ability to proceed with the FS for the sites in the industrial exclusive area. Ecology does not endorse proceeding with the FS for the ditches and ponds in the preservation (mining) area.

The basis for these conclusions is:

- The Washington State Department of Fish and Wildlife (DFW) has previously submitted comments on the 200-CW-1 Work Plan; those comments are unresolved.
- Ecology concurs with the DFW comments.
- The large ponds and their tributary ditches are in the area designated "Conservation (Mining)" by the Hanford Comprehensive Land Use Plan.
- The ponds are areally extensive, with potentially impacted areas of tens of acres.
- The sites in the area designated Conservation (Mining) represent important potential habitat for ecological receptors.
- USDOE has previously reported the transport and uptake of contaminants by plants and animals.
- The RI data is sufficient to characterize the original contaminant deposition, but is inadequate to characterize the potential transport and uptake of contamination by biological vectors (plants and animals).
- The RI report devotes less than one page of text (bottom of page 3-19 & most of page 3-20) and two pages of tables (page 3-53 & 3-54) to soil/vegetation results. The RI Report is deficient because it lacks statements about how those data will be used in the FS.
- The RI Report states that it "does not provide interpretation or risk evaluation for the ecological data gathered" and defers the issue of potential impacts to the Groundwater/Vadose Zone Integration Project. That deferral begs the question of how alternatives evaluated in the FS will be selected to prevent impacts to ecological resources.

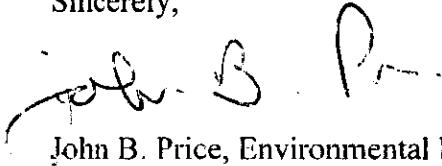
Ecology has two specific comments on the report:

Comment #	Section/Page	Comment
1.	1.3.2 / 1-4	Text should explain why it is "conservative" to calculate risk for an industrial scenario for the conservation (mining) designated use areas.
2.	3.2.1.3 / 3-7	"waste oil was detected" might be more appropriately stated "waste oil <u>constituents</u> were detected" unless there was a visual observation of stained soil (and if so, the text should indicate that).

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If you or your staff have any questions or comments regarding this letter, please feel free to contact me at (509) 736-3029.

Sincerely,

A handwritten signature in dark ink, appearing to read "John B. Price". The signature is fluid and cursive, with the first name "John" being the most prominent.

John B. Price, Environmental Restoration Project Manager  
Nuclear Waste Program

JBP:sdb

cc: Doug Sherwood, EPA  
Jay McConnaughey, DFW  
Mary Lou Blazek, OOE  
Administrative Record: 200-CW-1